

DEC 18 2006

Application Serial No.: 09/847,677
Amendment and Response to July 18, 2006 Final Office Action

a financial exposure of the entity as related to said at least one customer across the plurality of operating units. (emphasis added)

Thus, it is clear that Applicant claims a method wherein the mapping of the at least one product identifier to a standardized product identifier is accomplished by associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity, the mapping of the at least one collateral identifier to a standardized collateral identifier is accomplished by associating collateral nomenclature from each of the plurality of operating units with collateral nomenclature of the entity; and the generated aggregated exposure information for the entity is related to the at least one customer to indicate a financial exposure of the entity as related to said at least one customer across the plurality of operating units. Claims 22 and 24 are worded, in relevant part, similar to claim 1.

Contrary to the Applicant's claims 1, 22, and 24, the cited and relied upon Borkovsky discloses a method for normalizing names and descriptions of items. According to Borkovsky, item name variants are grouped together form clusters and each cluster of item name variants is mapped to a normalized item name. (See Borkovsky)

Applicant respectfully notes Borkovsky does not disclose or suggest the clusters, normalized names, or variant names in the context of or related to a plurality of operating units for an entity. To the contrary, Borkovsky merely discloses the mapping of variant names to a normalized name. No distinction or suggestion is provided regarding an association of a name variant and a normalized name for an item regarding an operating unit. Thus, the Office Action's statement that Borkovsky discloses mapping said product identifier to a standardized product identifier by associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity is false. Again, Borkovsky neither discloses nor suggests mapping a product nomenclature for each of a plurality of operating units with a standard product nomenclature of an entity. The Office Action appears to fail to

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mention the relationship of the product nomenclature to the entity in rejecting the claims.

Applicant notes that the mapping of the product identifiers by associating product nomenclature from each of the plurality operating units with product nomenclature of the entity is not a mere design choice but instead offers substantial benefit in, for example, a business entity having multiple operating units with a plurality of products. Accordingly, the claimed aspects of the operating units and the nomenclature of the entity deserve every consideration when determining the patentability of the claims.

Regarding the mapping of the collateral identifier by associating collateral nomenclature from each of the plurality of operating units with collateral nomenclature of the entity, Applicant submits that Borkovsky is silent regarding any type of nomenclature of an operating unit and nomenclature of an entity.

Therefore, the cited and Borkovsky does not disclose that for which it is cited and relied upon and, more importantly, that which is claimed by Applicant. Combining Borkovsky and Lewis therefore does not correct the deficiencies of Lewis since Borkovsky fails to disclose that for which it was cited and relied upon for disclosing.

Applicant further submits that combining the cited and relied upon Lewis, Borkovsky, and Tan as alleged in the Office Action fails to correct the deficiencies of Lewis since Borkovsky (at least) fails to disclose that for which it was cited and relied

Therefore, Applicant respectfully submits that claims 1 and 22 are not anticipated by Lewis, Borkovsky, and Tan under 35 USC 103(a). Claims 2 – 20 and 22 depend from claim 1. Applicant submits that claims 2 – 20 and 22 depending from claim 1 are patentable over Lewis, Borkovsky, and Tan for at least depending from an allowable base claim.

Accordingly, the reconsideration and withdrawal of the rejection of claims 1 – 20 and 22 under 35 USC 103(a) are respectfully requested, as well as the allowance of same.